

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

\*

**v.**

\*

**Criminal No. GLR-11-0310**

**YVONNE CASTLE TAYLOR**

\*

**...oOo...**

**GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTIONS**

The United States of America, by and through undersigned counsel, hereby opposes and responds to pre-trial motions filed by the defendant, Yvonne Castle Taylor. On June 1, 2012, the defendant filed motions seeking an order directing the government: to provide the exhibits and exhibit list at least 20 days prior to trial (Docket no. 32); to provide a witness list at least 20 days prior to trial (Docket no. 35) and; to designate which evidence it will use in its case in chief that is discoverable under Rule 16 (Docket no. 34).

The government opposes all three of these motions. The defendant has not cited any authority for the orders requested. Furthermore, the defendant has not articulated any facts or circumstances that would necessitate the court acquiescing to the defendant's request.

With respect to the government's discovery obligations, the government has abided to, and will continue to abide by, its obligations under Rule 16.

Respectfully submitted,

Rod J. Rosenstein  
United States Attorney

Date: June 25, 2012

By: /s/  
Constantine Lizas  
Special Assistant United States Attorney  
36 S. Charles Street, Fourth Floor  
Baltimore, Maryland 21201  
(410) 209-4889

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 25th day of June, 2012, a copy of the foregoing Government's Response to Defendant's Motions was served via ECF to Lance Hamm.

/s/  
Constantine Lizas  
Assistant United States Attorney